

August 16, 2004

The Honorable Pat Miller, Chairman c/o Shara Dillon, Docket Manager TENNESEE REGULATORY AUTHORITY 460 James Robertson Parkway Nashville, TN 37243-0505

RE:

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TRA Docket No. 04-00193

Section 254(e) Certification of Ben Lomand Communications, Inc.

To Receive USF Disbursements In Calendar Year 2005

Dear Chairman Miller,

Attached hereto is the Certification Letter of Levoy Knowles, Executive Vice-President of Ben Lomand Communications, Inc. (the "Company"), certifying that the Company is in compliance with the requirements of Section 254(e) and the requirements established by the Federal Communications Commission ("FCC") in In the Matter of Federal-State Joint Board on Universal Service, Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking in CC Docket No 96-45 and Report and Order in CC Docket No. 00-256, CC Docket Nos. 96-45 and 00-256, FCC 01-157, released May 23, 2001. Also attached is a report regarding our 2003 support payments in response to Ms. Darlene Standley's July 23, 2004 letter.

Based on the foregoing, the Company respectfully requests that the Tennessee Regulatory Authority certify by no later than October 1, 2004 to the FCC and the Universal Service Administrative Company that the Company is in compliance with its obligations under Section 254(e) of the Communications Act of 1934, as amended.

In addition to this original, I am submitting a date "stamp and return" copy (and accompanying postage prepaid, self-addressed envelope) that I ask you to please use for this purpose. Should you have questions or need additional information you may contact me at 931-668-4131.

Sincerely,

Ben Lomand Communications

Levoy Knowles

Executive Vice-President

Lucy Knowles

LK/bh

Attachments

Cc: Darlene Standley

Chief, Telecommunications Division





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To Receive USF Disbursements In Calendar Year 2005

Dear Chairman Miller,

I, Levoy Knowles, Executive Vice-President of Ben Lomand Communications, Inc. (the "Company") do hereby certify under penalty of perjury that the following is true and accurate to the best of my knowledge and belief:

- 1. I am the Executive Vice-President of the Company;
- 2. The Company is subject to the jurisdiction of the Tennessee Regulatory Authority;
- 3. The Company is eligible for disbursements for the Federal Universal Service Fund ("USF") as prescribed by the Federal Communications Commission; and
- 4. The Company will utilize its USF disbursements for high cost support (including any high cost loop support, local switching support, high cost support received pursuant to the purchase of exchanges, high cost model support, and hold harmless support for which it is eligible) received in 2005 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Communications Act of 1934, as amended.

Sincerely Yours,

Levoy Knowles

Executive Vice-President

LK/bh



Ben Lomand Communications, Inc.

Universal Service Payments - 2003

	High Cost & IAS Support	Lifeline & Linkup
January	\$25,828.00	\$5,101 00
February	26,124.00	5,152 00
March	33,810 00	5,661 00
Aprıl	25,590 00	5,122 00
May	(71,729 00)	5,646 00
June	19,405 00	5,425 00
July	19,405.00	5,088 00
August	19,266 00	4,735 00
September	1,281 00	4,906 00
October	11,301 00	5,878 00
November	18,460 00	5,676 00
December	<u>17,839 00</u>	<u>5,277 00</u>
	\$146,580 00	\$63,667 00

Ben Lomand Communications, Inc is a facilities based CLEC and does not make a cost allocation of USF funds

The Lifeline and Linkup Funds were used to reduce installation charges and monthly charges to eligible low income customers

The High Cost & IAS funds were used to maintain the outside plant and to upgrade the remotes The negative amount is a result of USAC paying Ben Lomand Communications based on the support of the wrong incumbent